

LEXI J. HAZAM  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: 415-956-1000  
[lhazam@lchb.com](mailto:lhazam@lchb.com)

*Co-Lead Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

This Document Relates To:  
  
ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF LEXI J. HAZAM IN  
SUPPORT OF PLAINTIFFS' RESPONSE  
TO DEFENDANTS' MOTION TO  
EXCLUDE GENERAL CAUSATION  
TESTIMONY OF PLAINTIFFS' EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**DECLARATION OF LEXI J. HAZAM**

I, Lexi J. Hazam, declare:

1. I am a partner in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP ("LCHB"), and serve as Court-appointed Co-Lead Counsel for the Personal Injury and School District Plaintiffs in this action. I have personal knowledge of the facts set forth in this Declaration, and, if called as a witness, could and would testify competently to them.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the June 18, 2025 JCCP Deposition of Dr. Anna Lembke. Filed under seal.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the June 12-13, 2025 JCCP Deposition of Dr. Eva Telzer. Filed under seal.

1           4.       Attached hereto as **Exhibit 3** is a true and correct copy of the September 26, 2025 MDL  
2 Deposition of Dr. Mitch Prinstein. Filed under seal.

3           5.       Attached hereto as **Exhibit 4** is a true and correct copy of the July 30, 2025 MDL Deposition  
4 of Dr. Bradley Zicherman. Filed under seal.

5           6.       Attached hereto as **Exhibit 5** is a true and correct copy of the June 4-5, 2025 JCCP  
6 Deposition of Dr. Ramin Mojtabai. Filed under seal.

7           7.       Attached hereto as **Exhibit 6** is a true and correct copy of the Expert Rebuttal Report of Dr.  
8 Ramin Mojtabai, dated July 30, 2025. Filed under seal.

9           8.       Attached hereto as **Exhibit 7** is a true and correct copy of the Expert Rebuttal Report of Dr.  
10 Anna Lembke, dated July 30, 2025. Filed under seal.

11           9.       Attached hereto as **Exhibit 8** is a true and correct copy of the Expert Report of Dr. Bradley  
12 Zicherman, dated May 16, 2025. Filed under seal.

13           10.      Attached hereto as **Exhibit 9** is a true and correct copy of American Psychiatric Association,  
14 *What is Technology Addiction* (Feb. 2024), [https://www.psychiatry.org/patients-families/technology-](https://www.psychiatry.org/patients-families/technology-addictions-social-media-and-more/what-is-technology-addiction)  
15 [addictions-social-media-and-more/what-is-technology-addiction](https://www.psychiatry.org/patients-families/technology-addictions-social-media-and-more/what-is-technology-addiction).

16           11.      Attached hereto as **Exhibit 10** is a true and correct copy of the Expert Report of Dr. Anna  
17 Lembke, dated May 16, 2025. Filed under seal.

18           12.      Attached hereto as **Exhibit 11** is a true and correct copy of the Expert Rebuttal Report of Dr.  
19 Dimitri Christakis, dated July 30, 2025. Filed under seal.

20           13.      Attached hereto as **Exhibit 12** is a true and correct copy of the Expert Report of Dr. Mitch  
21 Prinstein, dated May 16, 2025. Filed under seal.

22           14.      Attached hereto as **Exhibit 13** is a true and correct copy of the Expert Report of Dr. Ramin  
23 Mojtabai, dated May 16, 2025. Filed under seal.

24           15.      Attached hereto as **Exhibit 14** is a true and correct copy of the Expert Rebuttal Report of Dr.  
25 Bradley Zicherman, dated July 30, 2025. Filed under seal.

26           16.      Attached hereto as **Exhibit 15** is a true and correct copy of the Expert Report of Dr. Dimitri  
27 Christakis, dated May 16, 2025. Filed under seal.  
28

1           17.     Attached hereto as **Exhibit 16** is a true and correct copy of the July 9, 2025 JCCP Deposition  
2 of Dr. Drew Cingel. Filed under seal.

3           18.     Attached hereto as **Exhibit 17** is a true and correct copy of the June 26, 2025 JCCP  
4 Deposition of Dr. Jean Twenge. Filed under seal.

5           19.     Attached hereto as **Exhibit 18** is a true and correct copy of the August 27, 2025 MDL  
6 Deposition of Dr. Anna Lembke. Filed under seal.

7           20.     Attached hereto as **Exhibit 19** is a true and correct copy of the September 17, 2025 MDL  
8 Deposition of Dr. Lauren Hale. Filed under seal.

9           21.     Attached hereto as **Exhibit 20** is a true and correct copy of the Expert Rebuttal Report of Dr.  
10 Jean Twenge, dated July 30, 2025. Filed under seal.

11           22.     Attached hereto as **Exhibit 21** is a true and correct copy of Rothwell, J. (2023, October 13).  
12 *Teens spend average of 4.8 hours on social media per day*. Gallup.  
13 <https://news.gallup.com/poll/512576/teens-spend-average-hours-social-media-per-day.aspx>.

14           23.     Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from the Federal Judicial  
15 Center, Reference Manual on Scientific Evidence (3d ed. 2011).

16           24.     Attached hereto as **Exhibit 23** is a true and correct copy of Hill, A. B. (1965). The  
17 Environment and Disease: Association or Causation?. *Proceedings of the Royal Society of Medicine*, 58(5),  
18 295-300.

19           25.     Attached hereto as **Exhibit 24** is a true and correct copy of the June 25-26, 2025 JCCP  
20 Deposition of Dr. Dimitri Christakis. Filed under seal.

21           26.     Attached hereto as **Exhibit 25** is a true and correct copy of Office of the Surgeon General,  
22 *Social Media and Youth Mental Health: The U.S. Surgeon General's Advisory*. U.S. Department of Health  
23 and Human Services (2023).

24           27.     Attached hereto as **Exhibit 26** is a true and correct copy of the Expert Rebuttal Report of Dr.  
25 Mitch Prinstein, dated July 30, 2025. Filed under seal.

26           28.     Attached hereto as **Exhibit 27** is a true and correct copy of excerpts of the July 11, 2025  
27 JCCP Deposition of Dr. Ian Gotlib. Filed under seal.  
28

29. Attached hereto as **Exhibit 28** is a true and correct copy of excerpts of the September 12, 2025 MDL Deposition of Dr. Stephen Buka. Filed under seal.

30. Attached hereto as **Exhibit 29** is a true and correct copy of the August 12, 2025 MDL Deposition of Dr. Ramin Mojtabai. Filed under seal.

31. Attached hereto as **Exhibit 30** is a true and correct copy of the June 19, 2025 JCCP Deposition of Dr. Stuart Murray. Filed under seal.

32. Attached hereto as **Exhibit 31** is a true and correct copy of Mojtabai, R., & Olfson, M. (2025). Trends in Mental Disorders in Children and Adolescents Receiving Treatment in the State Mental Health System. *Journal of the American Academy of Child and Adolescent Psychiatry*, 64(8), 906–920.

33. Attached hereto as **Exhibit 32** is a true and correct copy of the Expert Report of Dr. Stuart Murray, dated May 16, 2025. Filed under seal.

34. Attached hereto as **Exhibit 33** is a true and correct copy of Faverio, M., & Sidoti, O. (2024). Teens, Social Media and Technology 2024. *Pew Research Center*. [https://www.pewresearch.org/wp-content/uploads/sites/20/2024/12/PI\\_2024.12.12\\_Teens-Social-Media-Tech\\_REPORT.pdf](https://www.pewresearch.org/wp-content/uploads/sites/20/2024/12/PI_2024.12.12_Teens-Social-Media-Tech_REPORT.pdf).

35. Attached hereto as **Exhibit 34** is a true and correct copy of Radesky, J., Weeks, H., Schaller, A., Robb, M., Mann, S., & Lenhart, A. (2023). Constant Companion: A Week in the Life of a Young Person's Smartphone Use. *Common Sense Media*. <https://perma.cc/WS5U-YQHU>.

36. Attached hereto as **Exhibit 35** is a true and correct copy of American Academy of Pediatrics. (2023, October 17). Problematic Technology Use. *American Academy of Pediatrics*. [https://www.aap.org/en/patient-care/media-and-children/center-of-excellence-on-social-media-and-youth-mental-health/qa-portal/qa-portal-library/qa-portal-library-questions/problematic-technology-use/?srsltid=AfmBOopEs2Yjb\\_x2JUrwW2hIRq-4KkJJAXnORwoQPoAMqX6n-5PQKavJ](https://www.aap.org/en/patient-care/media-and-children/center-of-excellence-on-social-media-and-youth-mental-health/qa-portal/qa-portal-library/qa-portal-library-questions/problematic-technology-use/?srsltid=AfmBOopEs2Yjb_x2JUrwW2hIRq-4KkJJAXnORwoQPoAMqX6n-5PQKavJ).

37. Attached hereto as **Exhibit 36** is a true and correct copy of the Expert Report of Dr. Kendra Becker, dated July 9, 2025. Filed under seal.

38. Attached hereto as **Exhibit 37** is a true and correct copy of Christakis, D. A., & Hale, L. (2025). Toward Defining Problematic Media Usage Patterns in Adolescents. *JAMA*, 333(23), 2045–2046.

39. Attached hereto as **Exhibit 38** is a true and correct copy of Exhibit 35 to the June 25-26, 2025 JCCP Deposition of Dr. Dimitri Christakis.

40. Attached hereto as **Exhibit 39** is a true and correct copy of Kleemans, M., Daalmans, S., Carbaat, I., & Anschütz, D. (2018). Picture perfect: The direct effect of manipulated instagram photos on body image in adolescent girls. *Media Psychology*, 21(1), 93–110.

41. Attached hereto as **Exhibit 40** is a true and correct copy of Exhibit 4 to the September 11, 2025 MDL Deposition of Dr. Dimitri Christakis.

42. Attached hereto as **Exhibit 41** is a true and correct copy of the September 11, 2025 MDL Deposition of Dr. Dimitri Christakis. Filed under seal.

43. Attached hereto as **Exhibit 42** is a true and correct copy of Sherman, L. E., Payton, A. A., Hernandez, L. M., Greenfield, P. M., & Dapretto, M. (2016). The Power of the Like in Adolescence: Effects of Peer Influence on Neural and Behavioral Responses to Social Media. *Psychological science*, 27(7), 1027–1035.

44. Attached hereto as **Exhibit 43** is a true and correct copy of Neyman, C. (2017) A Survey of Addictive Software Design. *Digital Commons @ Cal Poly*. <https://digitalcommons.calpoly.edu/cscsp/111/>.

45. Attached hereto as **Exhibit 44** is a true and correct copy of Monge Roffarello, A., & De Russis, L. (2023). Nudging users or redesigning interfaces? Evaluating novel strategies for digital wellbeing through inControl. In *Proceedings of the 2023 ACM Conference on Information Technology for Social Good* (pp. 100-109).

46. Attached hereto as **Exhibit 45** is a true and correct copy of Chen, C., Kang, J., Sajjadi, P., & Sundar, S. S. (2024). Preventing users from going down rabbit holes of extreme video content: A study of the role played by different modes of autoplay. *International Journal of Human-Computer Studies*, 190, 103303.

47. Attached hereto as **Exhibit 46** is a true and correct copy of van Essen, C. M., & Van Ouytsel, J. (2023). Snapchat streaks—How are these forms of gamified interactions associated with problematic smartphone use and fear of missing out among early adolescents?. *Telematics and Informatics Reports*, 11, 100087.

48. Attached hereto as **Exhibit 47** is a true and correct copy of Dores, A. R., Peixoto, M., Fernandes, C., Marques, A., & Barbosa, F. (2025). The Effects of Social Feedback Through the "Like" Feature on Brain Activity: A Systematic Review. *Healthcare (Basel, Switzerland)*, 13(1), 89.

49. Attached hereto as **Exhibit 48** is a true and correct copy of Baker Dennis, A. (n.d.). *Media and Eating Disorders*. National Eating Disorders Association.  
<https://www.nationaleatingdisorders.org/media-and-eating-disorders/>.

50. Attached hereto as **Exhibit 49** is a true and correct copy of American Academy of Pediatrics, Family Media Plan. <https://www.healthychildren.org/English/fmp/Pages/MediaPlan.aspx>.

51. Attached hereto as **Exhibit 50** is a true and correct copy of the Expert Report of Dr. Drew Cingel, dated May 16, 2025. Filed under seal.

52. Attached hereto as **Exhibit 51** is a true and correct copy of the Expert Report of Dr. Gary Goldfield, dated November 3, 2025. Filed under seal.

53. Attached hereto as **Exhibit 52** is a true and correct copy of the September 10, 2025 MDL Deposition of Dr. Gary Goldfield. Filed under seal.

54. Attached hereto as **Exhibit 53** is a true and correct copy of the July 10-11, 2025 JCCP Deposition of Dr. Gary Goldfield. Filed under seal.

55. Attached hereto as **Exhibit 54** is a true and correct copy of Jovey, R. (2012). Opioids, pain and addiction - practical strategies. *British journal of pain*, 6(1), 36–42.

56. Attached hereto as **Exhibit 55** is a true and correct copy of Volume 3 of the Trial Transcript in Case Track Three of *In Re: Nat'l Prescrip. Opiate Litig.* (Case No. 1:17-md-02084, N.D. Ohio).

57. Attached hereto as **Exhibit 56** is a true and correct copy of the Expert Report of Dr. Randy Auerbach, dated July 9, 2025. Filed under seal.

58. Attached hereto as **Exhibit 57** is a true and correct copy of Gupta, R., Chernesky, J., Lembke, A., Michaels, D., Tomori, C., Greene, J. A., Alexander, G. C., & Koon, A. D. (2024). The opioid industry's use of scientific evidence to advance claims about prescription opioid safety and effectiveness. *Health Affairs Scholar*, 2(10), qxae119.

59. Attached hereto as **Exhibit 58** is a true and correct copy of the August 25, 2025 MDL Deposition of Dr. Stuart Murray. Filed under seal.

60. Attached hereto as **Exhibit 59** is a true and correct copy of the Expert Rebuttal Report of Dr. Stuart Murray, dated July 30, 2025. Filed under seal.

61. Attached hereto as **Exhibit 60** is a true and correct copy of the Expert Report of Dr. Terry Schwartz, dated July 9, 2025. Filed under seal.

62. Attached hereto as **Exhibit 61** is a true and correct copy of Exhibit 5 to the August 25, 2025 MDL Deposition of Dr. Stuart Murray. Filed under seal.

63. Attached hereto as **Exhibit 62** is a true and correct copy of the Expert Report of Dr. Eva Telzer, dated May 16, 2025. Filed under seal.

64. Attached hereto as **Exhibit 63** is a true and correct copy of the Expert Rebuttal Report of Dr. Eva Telzer, dated July 20, 2025. Filed under seal.

65. Attached hereto as **Exhibit 64** is a true and correct copy of Tiggemann, M., Hayden, S., Brown, Z., & Veldhuis, J. (2018). The effect of Instagram “likes” on women’s social comparison and body dissatisfaction. *Body Image*, 26, 90–97.

66. Attached hereto as **Exhibit 65** is a true and correct copy of Su, C., Zhou, H., Gong, L., Teng, B., Geng, F., & Hu, Y. (2021). Viewing personalized video clips recommended by TikTok activates default mode network and ventral tegmental area. *NeuroImage*, 237, 118136.

67. Attached hereto as **Exhibit 66** is a true and correct copy of Maza, M. T., Fox, K. A., Kwon, S. J., Flannery, J. E., Lindquist, K. A., Prinstein, M. J., & Telzer, E. H. (2023). Association of Habitual Checking Behaviors on Social Media With Longitudinal Functional Brain Development. *JAMA Pediatrics*, 177(2), 160–167.

68. Attached hereto as **Exhibit 67** is a true and correct copy of META3047MDL-020-00082810. Filed under seal.

69. Attached hereto as **Exhibit 68** is a true and correct copy of the August 8, 2025 MDL Deposition of Dr. Eva Telzer. Filed under seal.

70. Attached hereto as **Exhibit 69** is a true and correct copy of Burnell, K., Flannery, J., Fox, K., Prinstein, M., & Telzer, E. (2024). U.S. Adolescents’ daily social media use and well-being: Exploring the role of addiction-like social media use. *Journal of Children and Media*, 19(1), 1-19 and Flannery, J., Burnell, K., Kwon, S., Jorgensen, N., Prinstein, M., Lindquist, K., & Telzer, E. (2024). Developmental changes in brain function linked with addiction-like social media use two years later. *Social Cognitive and Affective Neuroscience*, 19(1), 1-10.



71. Attached hereto as **Exhibit 70** is a true and correct copy of Charmaraman, L., Smucker, R., Theran, S. A., Dam, S., & Anthony, J. (2025). The Benefits and Challenges of the Parental Monitoring of YouTube in Adolescents' Lives: A Qualitative Study of Emotion and Sleep Regulation. *Behavioral Sciences (Basel, Switzerland)*, 15(6), 805.

72. Attached hereto as **Exhibit 71** is a true and correct copy of Bardakci, S. (2019). Exploring high school students' educational use of YouTube. *The International Review of Research in Open and Distributed Learning*, 20(2).

73. Attached hereto as **Exhibit 72** is a true and correct copy of Lozano-Blasco, R., Mira-Aladrén, M., & Gil-Lamata, M. (2023). Social Media Influence on Young People and Children: Analysis on Instagram, Twitter and YouTube. *Comunicar: Media Education Research Journal*, 31(74), 117-128.

74. Attached hereto as **Exhibit 73** is a true and correct copy of Shoufan, A., & Mohamed, F. (2022). YouTube and education: A scoping review. *IEEE Access*, 10, 125576-125599.

75. Attached hereto as **Exhibit 74** is a true and correct copy of Adelhardt, Z., & Eberle, T. (2022). YouTube as a source of educational content in teenagers' learning practices. In *European Conference on Social Media* (Vol. 9, No. 1, pp. 277-279).

76. Attached hereto as **Exhibit 75** is a true and correct copy of the Expert Report of Dr. Jean Twenge, dated May 16, 2025. Filed under seal.

77. Attached hereto as **Exhibit 76** is a true and correct copy of the September 17-18, 2025 MDL Deposition of Dr. Jean Twenge. Filed under seal.

78. Attached hereto as **Exhibit 77** is a true and correct copy of Twenge J. M. (2020). Why increases in adolescent depression may be linked to the technological environment. *Current Opinion in Psychology*, 32, 89-94.

79. Attached hereto as **Exhibit 78** is a true and correct copy of the Expert Report of Dr. Sharon Hoover, dated May 16, 2025. Filed under seal.

80. Attached hereto as **Exhibit 79** is a true and correct copy of the August 12-13, 2025 MDL Deposition of Dr. Sharon Hoover. Filed under seal.

81. Attached hereto as **Exhibit 80** is a true and correct copy of the Expert Rebuttal Report of Dr. Sharon Hoover, dated July 30, 2025. Filed under seal.



82. Attached hereto as **Exhibit 81** is a true and correct copy of Siebers, T., Beyens, I., Pouwels, J., & Valkenburg, P. (2021). Social media and distraction: an experience sampling study among adolescents. *Media Psychology*, 25(3), 343-366.

83. Attached hereto as **Exhibit 82** is a true and correct copy of Christakis, D. A., Mathew, G. M., Reichenberger, D. A., Rodriguez, I. R., Ren, B., & Hale, L. (2025). Adolescent Smartphone Use During School Hours. *JAMA Pediatrics*, 179(4), 475-478.

84. Attached hereto as **Exhibit 83** is a true and correct copy of Dontre, A. (2020). The influence of technology on academic distraction: A review. *Human Behavior & Emerging Technologies*, 3(3), 379-390.

85. Attached hereto as **Exhibit 84** is a true and correct copy of Hunt, M. G., Marx, R., Lipson, C., & Young, J. (2018). No more FOMO: Limiting social media decreases loneliness and depression. *Journal of Social and Clinical Psychology*, 37(10), 751-768.

86. Attached hereto as **Exhibit 85** is a true and correct copy of Zahra, M. F., Qazi, T. A., Ali, A. S., Hayat, N., & ul Hassan, T. (2022). How Tiktok addiction leads to mental health illness? Examining the mediating role of academic performance using structural equation modeling. *Journal of Positive School Psychology*, 6(10), 1490-1502.

87. Attached hereto as **Exhibit 86** is a true and correct copy of Nesi, J. (2020). The impact of social media on youth mental health: challenges and opportunities. *North Carolina Medical Journal*, 81(2), 116-121.

88. Attached hereto as **Exhibit 87** is a true and correct copy of the July 30, 2025 Rebuttal Trial Report of Dr. Lauren Hale. Filed under seal.

89. Attached hereto as **Exhibit 88** is a true and correct copy of Alexander, J., Linkersdorfer, J., Toda-Thorne, K., Sullivan, R., Cummins, K., Tomko, R., Allen, N., Bagot, K., Baker, F., Fuemmeler, B., Hoffman, E., Kiss, O., Mason, M., Nguyen-Louie, T., Tapert, S., Smith, C., Squeglia, L., & Wade, N. (2024). Passively Sensing Smartphone Use in Teens with Rates of Use by Sex and Across Operating Systems. *JAMA Pediatrics*, 4(1), 476-77.

90. Attached hereto as **Exhibit 89** is a true and correct copy of META3047MDL-111-00371250. Filed under seal.

91. Attached hereto as **Exhibit 90** is a true and correct copy of the April 7, 2025 MDL Deposition of Arturo Béjar. Filed under seal.

92. Attached hereto as **Exhibit 91** is a true and correct copy of Exhibit 8 to the April 7, 2025 MDL Deposition of Arturo Béjar. Filed under seal.

93. Attached hereto as **Exhibit 92** is a true and correct copy of the Non-Retained Expert Disclosures dated November 7, 2025. Filed under seal.

94. Attached hereto as **Exhibit 93** is a true and correct copy of the July 10, 2025 JCCP Deposition of Arturo Béjar. Filed under seal.

95. Attached hereto as **Exhibit 94** is a true and correct copy of Exhibit 12 to the April 7, 2025 MDL Deposition of Arturo Béjar. Filed under seal.

96. Attached hereto as **Exhibit 95** is a true and correct copy of Exhibit 13 to the April 7, 2025 MDL Deposition of Arturo Béjar. Filed under seal.

97. Attached hereto as **Exhibit 96** is a true and correct copy of Nick, E., Kilic, Z., Nesi, J., Telzer, E., Lindquist, K., & Prinstein, M. (2022). Adolescent digital stress: Frequencies, correlates, and longitudinal association with depressive symptoms. *Journal of Adolescent Health*, 70(2), 336–339.

98. Attached hereto as **Exhibit 97** is a true and correct copy of excerpts of the September 24, 2025 MDL Deposition of Dr. Randy Auerbach. Filed under seal.

99. Attached hereto as **Exhibit 98** is a true and correct copy of Teen Accounts, Broken Promises – How Instagram is Failing to Protect Minors, <https://fairplayforkids.org/wp-content/uploads/2025/09/Teen-Accounts-Broken-Promises-How-Instagram-is-failing-to-protect-minors.pdf>.

100. Any of the above referenced exhibits that contain confidential information from non-Meta Defendants, including any quoted or cited language in the accompany brief, were not provide to the States Attorneys General.

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct.

Executed on November 7, 2025 in San Francisco, California.

Respectfully submitted,

By: /s/ Lexi J. Hazam

LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339

Telephone: 415-956-1000

[lhazam@lchb.com](mailto:lhazam@lchb.com)

*Co-Lead Counsel*